CERTIFICATE OF AUTHENTICITY OF RECORDS GENERATED BY AN ELECTRONIC PROCESS OR SYSTEM PURSUANT TO FEDERAL RULES OF EVIDENCE 902(11) AND 902(13)

I, Stanley K. Robinson, declare:

1.   I am employed by the National Geospatial-Intelligence Agency (NGA), which is headquartered in Springfield, Virginia. My title is Chief of Investigations for NGA's Counter Insider Threat Office, and I am authorized to submit this declaration on behalf of the NGA.

2.   The NGA has produced to the Federal Bureau of Investigation and the U.S. Attorney's Office for the Eastern District of Virginia (USAO-EDVA) true and correct copies of the following original records that were in the custody of the NGA:

   a.   Daniel Hale's physical access badge records, which I initialed on July 11, 2019, and to which the USAO-EDVA added Bates Nos. US-40002 to 40097;

   b.   A one-page personal profile record for Daniel Hale, which I initialed on November 10, 2020, and to which the USAO-EDVA added Bates No. 40000;

   c.   Daniel Hale's log-in and lock screen records for his user profile on the NGA's GOLD and TITANIUM computer networks, which I initialed on November 10, 2020, and to which the USAO-EDVA added Bates Nos. 20187A to 20273A;

   d.   A one-page document listing the dates, times, file names, and number of pages for documents printed via Daniel Hale's user profile on NGA's TITANIUM computer network, which I initialed on November 10, 2020, and to which the USAO-EDVA added Bates No. 40001; and

   e.   18 print outs of the binary files generated as a result of Daniel Hale's user profile printing documents on NGA's TITANIUM computer network, which I initialed on October 15, 2020, and to which the FBI added Bates Numbering to all of those files, a subset of which is: DP021-032; DP043-044; DP046A, 048-059, 062-063; DP065-103, 105-108; DP132; DP138; DP140, 142; DP153-155; DP157-173; DP179-180; DP182-282, 284-296, 298-348, 350; DP442; DP444; DP446-448; DP451; DP453; DP455-456; DP478-513;

   f.   33 PDFs of binary files described above in 2(e) that were created by opening the binary files in a software application called O&K and a software application called Ghost PCL, which were burned to a CD on October 19, 2020, and initialed by me on November 10, 2020, and which were printed by the USAO-EDVA and Bates stamped to include the following subset of Bates Numbers: OK034-042;

OK020-021; OK123, 125-135; OK001; OK023; OK053-055; OK136-149; OK156-157; OK002; OK003; OK062-064; OK022; OK052; OK168; OK069-089; GPCL355-366; GPCL278-279; GPCL469, 471-482, 485-486; GPCL280-318, 320-323; GPCL393; GPCL001; GPCL342, 344; GPCL376-378; GPCL487-503; GPCL511-512; GPCL091-191, 193-205, 207-257, 259; GPCL260; GPCL261; GPCL385-387; GPCL341; GPCL375; GPCL523-524; and GPCL398-433.

3.   I am qualified to authenticate the records set forth above because I am familiar with how these records were created, managed, stored, and retrieved. I further state that:

a.   NGA's information technology systems record the aforementioned data automatically at or near the time the occurrence of an applicable act, event, or condition, and this data is kept in the course of the NGA's regularly conducted activity, and was made as a regular practice of NGA;

b.   Such records were generated by the NGA's electronic process or system that produces an accurate result; to wit, (i) the records were copied from electronic device(s), storage medium(s), or file(s) in the custody of the NGA in a manner to ensure that they are true copies of the original records; and (ii) NGA's electronic process or system is regularly verified by the NGA, and at all times pertinent to the records certified here the electronic process or system functioned properly and normally.

4.   I further state that this declaration is intended to satisfy Rule 902(11) and 902(13) of the Federal Rules of Evidence.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, pursuant to 28 U.S.C. § 1746.

17 Nov 2020
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Date

Stanley K. Robinson
_____
Stanley K. Robinson